

Zenith Ward, WSB #7-4584  
 Buchhammer & Ward, P.C.  
 1821 Logan Avenue  
 P.O. Box 568  
 Cheyenne, WY 82003-0568  
 (307) 634-2184  
 fax (307) 634-2199  
[zsw@wyoming.com](mailto:zsw@wyoming.com)

**IN THE UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF WYOMING**

CARLIE SHERMAN, ANNA GOZUN,  
 AMANDA NASH, and JOHN DOE on behalf  
 of themselves and all similarly situated  
 persons,

Plaintiffs,

vs.

Civil Action No. 20-CV-215-S

TRINITY TEEN SOLUTIONS, INC., a  
 Wyoming corporation; TRIANGLE CROSS  
 RANCH, LLC, a Wyoming limited liability  
 corporation; MONKS OF THE MOST  
 BLESSED VIRGIN MARY OF MOUNT  
 CARMEL, d/b/a MYSTIC MONK COFFEE,  
 a Wyoming corporation; GERALD E.  
 SCHNEIDER; MICHAEELEN P. SCHNEIDER;  
 ANGELA C. WOODWARD; JERRY D.  
 WOODWARD; DANIEL SCHNEIDER;  
 MATHEW SCHNEIDER; MARK SCHNEIDER  
 KARA WOODWARD; KYLE WOODWARD  
 THOMAS GEORGE; JUDITH D. JEFFERIS;  
 DALLY-UP, LLC, a Wyoming limited liability  
 corporation; ROCK CREEK RANCH, INC.  
 A Delaware corporation, DIOCESE OF  
 CHEYENNE, a Wyoming corporation; and the  
 SOCIETY OF OUR LADY OF THE MOST  
 HOLY TRINITY, a Texas corporation; and  
 NEW MOUNT CARMEL FOUNDATION, INC.,  
 a Wyoming corporation,

Defendants.

**DEFENDANTS JUDITH D. JEFFERIS AND ROCK CREEK RANCH INC.'S MOTION  
 TO DISMISS FIRST AMENDED COMPLAINT**

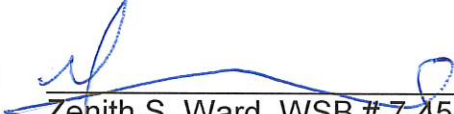
COMES NOW Defendants Judith D. Jefferis and Rock Creek Ranch, Inc., through  
 their attorneys Buchhammer & Ward, P.C., and hereby move this Court, pursuant to Fed.

R. Civ. P. 12(b)(6) to dismiss Plaintiff's Amended Complaint with prejudice as it pertains to Judith D. Jefferis and Rock Creek Ranch, Inc. for failure to state a claim upon which relief may be granted. In support of this Motion, Judith D. Jefferis and Rock Creek Ranch, Inc. hereby incorporate their Defendant Judith D. Jefferis and Rock Creek Ranch, Inc.'s Brief in Support of Motion to Dismiss First Amended Complaint pursuant to Local Rule 7.1(b)(2)(a).

DATED this 26<sup>th</sup> day of March, 2021

Judith D. Jefferis and Rock Creek Ranch, Inc.,  
Defendants.

By:

  
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### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties per the CM/ECF electronic service of the Court, this 26<sup>th</sup> day of March, 2021.

  
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Zenith S. Ward